

EXHIBIT C

Maria L. Nixon

From: Molshree Gupta
Sent: Monday, April 24, 2023 3:29 PM
To: Thomas Ferlauto
Cc: Maria L. Nixon; Patrick Stockalper; Spencer Carter; Barbara Ezra
Subject: RE: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Defts' Objections to Plnt's Notice of Deposition of Travis Kelly and PMK for the County of Los Angeles
Attachments: FW: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Defts' Objections to Plnt's Notice of Deposition of Travis Kelly and PMK for the County of Los Angeles
Importance: High

Attached is your email acknowledging receipt of the objections. Depos this week are off calendar. We have advised multiple times that Sgt. Kelly cannot be made to testify while on medical leave.

We are working with the County to identify PMKs. We are also working a Motion to continue the Trial and related dates based on Sgt. Kelly's unavailability. You previously declined to stipulate to the same, and I urge you to rethink this position. Please let me know either way.

Thanks,



Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Monday, April 24, 2023 3:17 PM
To: Molshree Gupta <mgupta@kmslegal.com>
Cc: Maria L. Nixon <mnixon@kmslegal.com>; Patrick Stockalper <pstockalper@kmslegal.com>; Spencer Carter <scarter@kmslegal.com>; Barbara Ezra <bezra@kmslegal.com>
Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Defts' Objections to Plnt's Notice of Deposition of Travis Kelly and PMK for the County of Los Angeles

What about tomorrows' deposition? What about Wednesday? What about Kelly and available dates? We have a cut-off in 16 days? Are you bringing a motion to extend dates? What is going on?

LAW OFFICE OF
THOMAS M. FERLAUTO
A Professional Law Corporation

Direct Dial 310-849-7554

25201 Paseo de Alicia, Suite 270
Laguna Hills, CA 92653
Phone: 949-334-8650

Facsimile: 949-334-8691

Email: TMF@lawofficeTMF.com
Website: www.lawofficeTMF.com

The information contained in this e-mail message is information protected by attorney-client and/or the attorney/work product privilege. It is intended only for the use of the individual named above and the privileges are not waived by virtue of this having been sent by e-mail. If the person actually receiving this e-mail or any other reader of the e-mail is not the name recipient or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution or copying of the communication is strictly prohibited. If you have received this communication in error, please delete it immediately.

On Apr 24, 2023, at 3:04 PM, Molshree Gupta <mgupta@kmslegal.com> wrote:

Good afternoon:

We are working with the County to identify the witness(es) responsive to the various categories you have enumerated.

Thanks,

<image001.jpg>

Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>

Sent: Monday, April 24, 2023 2:28 PM

To: Thomas Ferlauto <tmf@lawofficetmf.com>

Cc: Molshree Gupta <mgupta@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>; Patrick Stockalper <pstockalper@kmslegal.com>; Spencer Carter <scarter@kmslegal.com>; Barbara Ezra <bezra@kmslegal.com>

Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Defts' Objections to Plnt's Notice of Deposition of Travis Kelly and PMK for the County of Los Angeles

Counsel:

A response to this email would be appreciated.

LAW OFFICE OF
THOMAS M. FERLAUTO
A Professional Law Corporation

Direct Dial 310-849-7554

25201 Paseo de Alicia, Suite 270
Laguna Hills, CA 92653
Phone: 949-334-8650
Facsimile: 949-334-8691

Email: TMF@lawofficeTMF.com
Website: www.lawofficeTMF.com

The information contained in this e-mail message is information protected by attorney-client and/or the attorney/work product privilege. It is intended only for the use of the individual named above and the privileges are not waived by virtue of this having been sent by e-mail. If the person actually receiving this e-mail or any other reader of the e-mail is not the name recipient or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution or copying of the communication is strictly prohibited. If you have received this communication in error, please delete it immediately.

On Apr 21, 2023, at 8:35 AM, Thomas Ferlauto <tmf@lawofficetmf.com> wrote:

Counsel:

I am still waiting to hear back from you concerning your clients' depositions. You previously indicated that Defendants would be moving to continue dates due to unavailability of witnesses. Is that still the case? If not, we have a discovery cut-off that is rapidly approaching. I need to take your clients' depositions before that discovery cut-off. Those depositions are currently scheduled for next week. Unless we settle on mutually agreeable alternative dates, I need to go forward as scheduled and note your clients' non-appearance. Please let me know what you intend to do.

Thank you,

Thomas M. Ferlauto

LAW OFFICE OF
THOMAS M. FERLAUTO
A Professional Law Corporation

Direct Dial 310-849-7554

25201 Paseo de Alicia, Suite 270
Laguna Hills, CA 92653
Phone: 949-334-8650
Facsimile: 949-334-8691

Email: TMF@lawofficeTMF.com
Website: www.lawofficeTMF.com

The information contained in this e-mail message is information protected by attorney-client and/or the attorney/work product privilege. It is intended only for the use of the individual named above and the privileges are not waived by virtue of this having been sent by e-mail. If the person actually receiving this e-mail or any other reader of the e-mail is not the name recipient or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution or copying of the communication is strictly prohibited. If you have received this communication in error, please delete it immediately.

On Apr 18, 2023, at 3:04 PM, Molshree Gupta <mgupta@kmslegal.com> wrote:

Working on these, thanks.

<image001.jpg>

Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Tuesday, April 18, 2023 3:03 PM
To: Maria L. Nixon <mnixon@kmslegal.com>
Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Molshree Gupta

<mgupta@kmslegal.com>; Spencer Carter <scarter@kmslegal.com>;

Barbara Ezra <bezra@kmslegal.com>

Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. /
Defts' Objections to Plnt's Notice of Deposition of Travis Kelly and PMK
for the County of Los Angeles

I am in receipt of your deposition objections. As I have requested numerous times before, if the selected dates are inconvenient, please provide alternative dates before the discovery cut-off.

Thank you,

Thomas M. Ferlauto

LAW OFFICE OF
THOMAS M. FERLAUTO
A Professional Law Corporation

Direct Dial 310-849-7554

25201 Paseo de Alicia, Suite 270
Laguna Hills, CA 92653
Phone: 949-334-8650
Facsimile: 949-334-8691

Email: TMF@lawofficeTMF.com
Website: www.lawofficeTMF.com

The information contained in this e-mail message is information protected by attorney-client and/or the attorney/work product privilege. It is intended only for the use of the individual named above and the privileges are not waived by virtue of this having been sent by e-mail. If the person actually receiving this e-mail or any other reader of the e-mail is not the name recipient or the employee or agent responsible to deliver it to the named recipient, any use, dissemination, distribution or copying of the communication is strictly prohibited. If you have received this communication in error, please delete it immediately.

On Apr 18, 2023, at 2:39 PM, Maria L. Nixon
<mnixon@kmslegal.com> wrote:

Dear Counsel:

Attached please find our below documents in the above matter.

- Defts' Objections to Notice of Deposition of PMK for County of Los Angeles
- Defts' Objections to Notice of Deposition of Travis Kelly

Under CCP section 1010.6(e)(1), we elect to use electronic service for all notices and documents that may be served by mail, express mail, overnight delivery, or fax. Please let me know if there is another email address where you'd like to accept electronic

service for this case or if there are additional addresses that you'd like us to include.

Under CCP section 1010.6(e)(2), we ask that all parties use electronic service when serving us with all notices and documents that may be served by mail, express mail, overnight delivery, or fax. Please serve all documents on us electronically to the following email addresses: pstockalper@kmslegal.com; cjordan@kmslegal.com; bezra@kmslegal.com and mnixon@kmslegal.com.

Thank you,

<image001.jpg>

Maria Nixon
Legal Assistant/Paralegal to
Molshree Gupta, Esq.
Carina M. Jordan, Esq.
KJAR, McKENNA & STOCKALPER, LLP
841 Apollo Street, Suite 100
El Segundo, California 90245
424-217-3026 - Main No. (Ext. 1099)
424-369-8664 - Direct
424-367-0400 - Fax No.
424-369-8566 - Direct Fax No.
mnixon@kmslegal.com

www.kmslegal.com

THIS MESSAGE IS CONFIDENTIAL,
INTENDED FOR THE NAMED RECIPIENT(S)
AND MAY CONTAIN INFORMATION THAT IS
(I) PROPRIETARY TO THE SENDER,
AND/OR, (II) PRIVILEGED, CONFIDENTIAL,
AND/OR OTHERWISE EXEMPT FROM
DISCLOSURE UNDER APPLICABLE STATE
AND FEDERAL LAW, INCLUDING, BUT NOT
LIMITED TO, PRIVACY STANDARDS
IMPOSED PURSUANT TO THE FEDERAL
HEALTH INSURANCE PORTABILITY AND
ACCOUNTABILITY ACT OF 1996 ("HIPAA").
IF YOU ARE NOT THE INTENDED
RECIPIENT, OR THE EMPLOYEE OR AGENT
RESPONSIBLE FOR DELIVERING THE
MESSAGE TO THE INTENDED RECIPIENT,

YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY REPLY E-MAIL OR BY TELEPHONE AT 424-217-3026 AND DESTROY THE ORIGINAL TRANSMISSION AND ITS ATTACHMENTS WITHOUT READING OR SAVING THEM TO DISK. THANK YOU.

<Defts' Objections to Plnt's Notice of Deposition of Travis Kelly.PDF><Defts' Objections to Notice of Deposition of PMK for County of Los.PDF>